

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

**MOTION TO DISQUALIFY RICHARD GOLDHOR
FROM SERVING AS EXPERT FOR SCANSOFT**

Voice Signal hereby moves to disqualify ScanSoft's retained expert, Richard Goldhor, from serving as an expert in this case, at least with respect to ScanSoft's trade secret allegations. Dr. Goldhor has been tainted. He has been given access to Voice Signal's source code and Voice Signal's briefs prepared for the Neutral Expert, which include both source code and detailed descriptions of Voice Signal's implementations in key areas of its speech recognition engines. Having been tainted, he should not be permitted to advise ScanSoft or serve as its expert with respect to the trade secrets allegations in this case.

For the reasons set forth herein and further set forth in Voice Signal's Memorandum in Support of Motion to Disqualify Richard Goldhor from Serving as Expert for ScanSoft, filed herewith, Dr. Goldhor should be disqualified.

Respectfully submitted,

Dated: May 19, 2006.

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Sarah Chapin Columbia

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on May 19, 2006 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this Motion.

/s/ Sarah Chapin Columbia

CERTIFICATE OF SERVICE

I hereby certify as follows:

This document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 19, 2006.

/s/ Sarah Chapin Columbia

Sarah Chapin Columbia